



October 10, 2002

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By Facsimile

Honorable J. Frederick Motz
United States District Judge
District of Maryland
United States Courthouse
101 W. Lombard Street
Baltimore, Maryland 21201

- Re: (1) PracticeWorks, Inc., et al. v. Professional Software Solutions of Illinois, Inc., Civil No. JFM-02-1205 ✓
(2) Practice Works, Inc., et al. v. Dental Medical Automation, Inc., Civil No. JFM-02-1206

Dear Judge Motz:

We represent Plaintiffs PracticeWorks, Inc. and SoftDent, LLC ("Plaintiffs"). As the Court will recall, Plaintiffs have made motions for partial summary judgment and for partial judgment on the pleadings, which were opposed by Defendants Professional Software Solutions of Illinois, Inc. and Dental Medical Automation, Inc. ("Defendants"), and which were fully briefed on September 27, 2002. We make a joint request with counsel for Defendants to defer depositions that would otherwise have to be completed by the discovery deadline of October 31, 2002, until after Plaintiffs' motions have been decided. While the parties disagree as to the need for depositions in this case, they do agree that conducting and indeed concluding depositions while a potentially dispositive motion remains pending gives rise to the potential of wasted resources.

The parties already have exchanged document requests and interrogatories and have agreed that written responses and documents are due on October 16 for Plaintiffs and November 18 for Defendants, pending the Court's extension of the discovery cut-off beyond October 31.

Thank you for your consideration of this matter.

Respectfully submitted,

Michael S. Gordon

Approved
10/11/02
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